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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TERAH DAWN HOLT,

Plaintiff,

v.

KILOLO KIJAKAZI,
 Acting Commissioner of Social Security,

Defendant.

Case No.: 3:23-cv-00162-LRH-CLB

**ORDER GRANTING DEFENDANT'S
 UNOPPOSED MOTION FOR
 EXTENSION OF TIME
 (FIRST REQUEST)**

Defendant, the Commissioner of Social Security, respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion to Remand (Dkt. No. 16, filed on October 5, 2023), currently due on November 3, 2023, by 30 days, through and including December 4, 2023. Defendant further requests that all subsequent deadlines be extended accordingly.

This is Defendant's first request for an extension of time. Good cause exists for this extension due to Defendant's counsel's workload, as described below. In the span of four workdays, Defendant's counsel had three briefing deadlines, including this matter. Plaintiff also has an internal

1 deadline next week for a complex Ninth Circuit answering brief. Although counsel has exercised due
2 diligence, the requested additional time is necessary.

3 Additional time is required to review the record, evaluate the issues raised in Plaintiff's
4 motion, determine whether options exist for settlement, and if not, prepare Defendant's response to
5 Plaintiff's motion. This request is made in good faith and with no intention to unduly delay the
6 proceedings, and counsel apologizes for any inconvenience.

7 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this
8 motion.

9 It is therefore respectfully requested that Defendant be granted an extension of time to respond
10 to Plaintiff's Motion for Reversal and Remand, through and including December 4, 2023.

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13 Dated: November 2, 2023

Respectfully submitted,

14 JASON M. FRIERSON
United States Attorney

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16 /s/ Michael J. Mullen
MICHAEL J. MULLEN
Special Assistant United States Attorney

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19 IT IS SO ORDERED:

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UNITED STATES MAGISTRATE JUDGE

21 DATED: November 2, 2023.